

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

---

**IN THE MATTER OF  
THE COMPLAINT OF  
ETERNITY SHIPPING, LTD. AND  
EUROCARRIERS, S.A.  
FOR EXONERATION FROM OR  
LIMITATION OF LIABILITY**

\*

\*

\*

**CIVIL ACTION NO.**

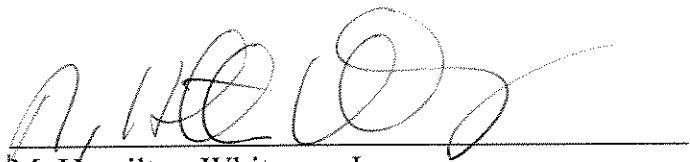
**L-01-CV-0250**

\* \* \* \* \*

**AGREED MOTION FOR REOPENING  
OF SUMMARY JUDGMENT MOTIONS**

In accordance with the Court's Memorandum to Counsel dated October 4, 2005, Limitation Plaintiffs Eternity Shipping, Ltd. and Eurocarriers, S.A. and Claimants Tate & Lyle North American Sugars, Inc. and American Bureau of Shipping hereby move the Court to reopen their respective Motions for Summary Judgment, Document Numbers [74], [73] and [76].

Counsel for Limitation Plaintiffs have been authorized to file this Motion on behalf of all movants.



M. Hamilton Whitman, Jr.  
Carla N. Bailey  
Ober, Kaler, Grimes & Shriver  
A Professional Corporation  
120 E. Baltimore Street  
Baltimore, Maryland 21202  
(410) 685-1120

Attorneys for Eternity Shipping, Ltd. and  
Eurocarriers, S.A.